ANNISTON ARMY DEPOT
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ANNISTON ARMY DEPOT
Clean Air Act Implementation Through an Environmental Management System
CH2MHILL
April 2004

CAA Implementation Through an EMS - Background

- Increased Production Stemming from National Security Initiatives
- Depot Wide Implementation of an ISO 14001 Certified EMS
- December 2003 Issuance of the Depot's First CAA Title V Permit

CAA Implementation - The Big Picture

CAA Implementation

- **Existing CAA Compliance Activities in Place**
  - Addressed NESHAP, NSPS, and existing permit provisions
- **Existing GIS and Web-based Systems for Managing Data**
- **Depot's Existing Air Permits Replaced by Title V Permit**
  - Issued December 2003
  - 149 pages
  - Contains MRRs (monitoring, recordkeeping, and reporting) requirements for air emission sources
  - Includes annual certification requirements
  - Federally enforceable legal document

CAA Implementation (cont.)

- **The New CAA Title V Compliance Approach Integrates Existing Systems**
  - Existing CAA Compliance Activities
  - Existing GIS and web-based systems
  - Depot's New EMS
- **Depot's New EMS Became the Framework for Integration**

What is an EMS?

Environmental Policy

Planning
- Environmental Aspects
- Legal & Other
- Objectives and Targets
- Env. Mgmt. Programs

Implementation & Operation
- Structure and Responsibility
- Training, Awareness & Competence
- Communication
- Document Control
- EMS Documentation
- Operational Control
- Emergency Preparedness & Response

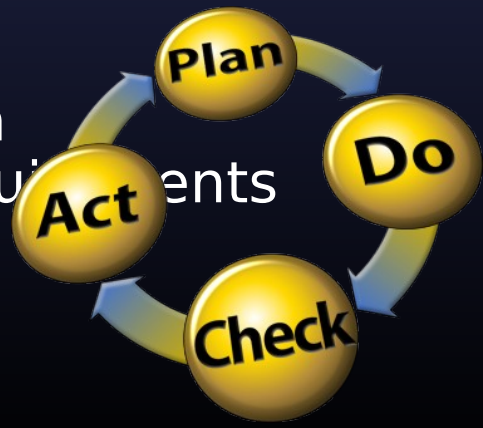
Checking & Corrective Action
- Monitoring & Measurement
- Non-Conformance/ Corrective & Preventive Action
- Records
- EMS Audits

Management Review

What is an EMS?

US Army EMS Implementation Guide Definition:

- Management system that integrates environmental concerns and issues into the organization's overall management process
- Addresses organizational structure, and resources for developing, achieving, implementing, and maintaining the environmental policy
- Enables an organization of any size or type to control the impact it has on the natural environment
- Allows an organization to achieve and maintain compliance with the current environmental requi ents



Benefits with EMS

- Improved environmental performance
- Reduced costs
- Improved compliance
- Improved process efficiency
- Improved confidence in the overall program
- Fewer overlaps and gaps between programs
- Maximize use of existing capabilities
- Proactive vs. reactive
- EMS implementation across DoD

CAA Implementation Through an EMS

- **Established Depot-Wide Procedures to Address CAA Compliance**
  - New Source Standard Operating Procedures (SOP)
  - Title V Compliance Procedures
- **Depot Staff Trained on the Procedures**
- **Implemented Procedures**
- **Checked and Verified Progress**

Depot-Wide Procedures to Address CAA Compliance

- **New Source SOP**
  - **Procedure established for notifying the Air Team of projects**
    - New emission sources identified early
    - Modifications to existing equipment/operations delineated prior to implementation and permitting
    - Decommissioning of emission sources properly documented and credits established

Depot-Wide Procedures to Address CAA Compliance (cont.)

- **New Source SOP**
  - **Includes elements to account for:**
    - Schedules/timeframes
    - Documentation and permitting requirements
    - Specifications for control equipment
    - Depot approvals and notification requirements
  - **Uses ANAD's existing web-based system**

Depot-Wide Procedures to Address CAA Compliance (cont.)

- **Title V Compliance Procedures**
  - **Gap analysis performed on ANAD's current CAA compliance procedures**
    - Data collection
    - Source monitoring
    - Documentation
  - **Defined MRR requirements of the permit**
  - **Developed procedures for each operation regulated by the permit**
    - Recordkeeping forms
    - Compliance report forms to submit to the State

Staff Training and Implementation

- **Developed Training Materials**
  - Permit overview and background information
  - Operator procedures
  - Recordkeeping forms
- **Conducted 5 Days of Training**
  - Shop by shop
  - Specific to each operations/emission source
  - Supervisors and operators

Checked and Verified Progress

- **Developed Inspection Checklist**
  - Operator procedures
  - MRR requirements
- **Conducted 3 Days of Inspections at the Depot**
  - Verified operators were correctly following procedures
  - Identified gaps in compliance activities
- **Informed Operators of Gaps and Reinforced Procedures**
- **Ongoing “Spot Checks”**

State Title V Audit in February 2004 Resulted in No Findings!

Conclusion

- **Quickly Responded to New CAA Compliance Requirements**
  - Compliance approach built on existing systems
- **Implemented Procedures to Engage Appropriate Personnel**
  - Multiple Directorates for new and modified sources
  - Operators for ongoing MRR compliance activities
  - Clear Accountability
- **Rapid and Efficient CAA Compliance Demonstrated**

Questions?